natural persons convicted under the statute involved in *State* v. *Paint Rock Coal Co.*, that case might be supported perhaps on the ground that the statute being bad as to the natural persons fails altogether. In the principal case, however, the statute, by its express terms applies only to corporations, imprisonment of which, in order to compel payment of a fine, in accordance with the general practice in case of natural persons, would be impossible; 7 AM. & ENG. ENCYC. (2nd ed.) 841; the fine against a corporation being assessed against the corporation as a political body and not against its officers, *State* v. *Barksdale,* 5 Humphr. (Tenn.) 154; *Hill* v. *State,* 4 Sneed (Tenn.) 442. The fine being enforceable, therefore, only by execution against the property of the corporation, the result of the statute is merely to impose a penalty for failing to pay a debt. The effect of the decision is to hold that the imposition of such a penalty is unconstitutional as amounting to a violation of the spirit, if not the letter, of the inhibition against imprisonment for debt.

CONSTITUTIONAL LAW.—LABOR LEGISLATION.—A statutory regulation prohibiting the employment of women in factories after ten at night and before six in the morning, was declared constitutional. *People* v. *Charles Schweinler Press* (N. Y. 1915) 108 N. E. 639.

After the decisions in *Muller* v. *Oregon,* 208 U. S. 412, and *Miller* v. *Wilson,* 35 Sup. Ct. 342, there could hardly be any doubt that the decision of the court is the correct one, but the case is especially interesting because of the decision in a prior New York case seven years ago, *People* v. *Williams,* 189 N. Y. 131. In this case a law of precisely similar nature, except that the hours were nine P. M. and six A. M., came before the court for consideration, and without a single dissent the law was declared unconstitutional, on the basis, among others, that it was discriminative against female citizens in denying them equal rights with men with respect to liberty of person or of contract, and the court used very strong language to uphold their opinion. In the instant case the more modern and progressive view is taken and the opinion is written by a judge who concurred in the former case, and whose language now just as strongly upholds the opposite view. Perhaps the wholesale criticism of this court incurred by the cases of *Ives* v. *R. R.,* 201 N. Y. 271 and *In the Matter of Jacobs,* 98 N. Y. 98 had something to do with the reversal of opinion. Suffice to say their viewpoint has materially changed for the better and now with such decisions as those in the instant case and in *People* v. *Klinck Packing Co.,* 108 N. E. 278 behind it, the court is rather to be praised for overruling itself, and adopting the newer and better view, than to be censured for the errors of the past.

CONSTITUTIONAL LAW.—NON-DISCRIMINATORY STATE REGULATION OF INTERSTATE COMMERCE.—A statute of Florida undertook to make it unlawful for anyone to ship in inter-state commerce any citrus fruits, immature and unfit for consumption. Appellant being indicted, upon appeal questions the authority of the state to enact such legislation. *Held,* the act is constitutional and a valid act of the police power falling within that class of cases in which